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February 20, 2015

VIA ECF

Judge Naomi Reice Buchwald
Pre-Motion Letter to Chambers

RE: In Re: Libor-Based Financial Instruments Antitrust Litigation,
Case 1:11-md-02262

Dear Judge Buchwald,

Plaintiffs' Nathan and Jerry Weglarz along with Plaintiff Stephanie Nagel respectfully request leave of Court to File Plaintiffs' Amended Consolidated Complaint.

Plaintiffs seek leave to file an amended complaint (Exhibit A) for the following reasons:

In its Motion to Dismiss Plaintiffs' Weglarz' consolidated complaint, Defendant JP Morgan Chase asserts that Plaintiff attached the wrong agreement to the complaint. However, upon investigating the source of the agreements attached to the complaint, it was revealed that the documents came from Weltman Weinberg and Reis Company, LPA, an agent of JP Morgan Chase with respect to the Weglarz Plaintiffs (Exhibit B). Thus, plaintiffs relied on the accuracy of the information provided by JP Morgan's Chase's counsel. Plaintiff has cured this alleged defect in the proposed amended complaint.

Additionally, Plaintiffs have also amended the complaint to include allegations that the European Union and the European Commission fined JP Morgan Chase in connection with its LIBOR Manipulation. Plaintiffs made other minor edits to the complaint that were not substantive in nature.

The defendants will not be prejudiced by the Court granting plaintiff leave to amend the complaint, nor are plaintiffs making this requests for purposes of delay.

CERTIFICATE OF SERVICE

I, Tiffany N. Hardy, hereby certify that on February 20, 2015, I caused a true and accurate copy of the foregoing document to be filed via the Court's CM/ECF system, which will send notification to all parties.

s/Tiffany N. Hardy
Tiffany N. Hardy